

BEFORE THE POWER SITING BOARD OF THE STATE OF OHIO

In the Matter of the Letter of Notification Application)
of AEP Ohio Transmission Company for a Certificate)
of Environmental Compatibility and Public Need for) **Case No. 19-1974-EL-BLN**
the Brookside-Sawmill 138 kV Transmission Line)
Rebuild Project)

Members of the Board:

Chairman, Public Utilities Commission	Ohio House of Representatives
Director, Development Services Agency	Ohio Senate
Director, Department of Health	
Director, Department of Agriculture	
Director, Environmental Protection Agency	
Director, Department of Natural Resources	
Public Member	

To the Honorable Power Siting Board:

Please review the attached Staff Report of Investigation, which has been filed in accordance with Ohio Power Siting Board (Board) rules. The accelerated certificate application in this case is subject to an automatic approval process as required by Ohio Revised Code (R.C.) 4906.03 and Ohio Administrative Code (Ohio Adm.Code) 4906-6.

Staff recommends the application for automatic approval February 4, 2020, unless suspended by the Board, an administrative law judge, or the chairperson or executive director of the Board for good cause shown. If suspended, the Board must render a decision on the application within 90 days from the date of suspension.

Please present any concerns you or your designee may have with this case to my office at least four business days prior to February 4, 2020, which is the recommended automatic approval date.

Sincerely,



Raymond W. Strom
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Public Utilities Commission of Ohio
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OPSB STAFF REPORT OF INVESTIGATION

Case Number: 19-1974-EL-BLN
Project Name: Brookside-Sawmill 138 kV Transmission Line Rebuild Project
Project Location: Franklin County
Applicant: AEP Ohio Transmission Company
Application Filing Date: November 5, 2019
Filing Type: Letter of Notification
Inspection Dates: December 6, 2019 and January 3, 2020
Report Date: January 28, 2020
Recommended Automatic Approval Date: February 4, 2020
Applicant's Waiver Requests: none
Staff Assigned: J. Pawley, M. Mansour, G. Zeto

Summary of Staff Recommendations (see discussion below):

Application: ☐ Approval ☐ Disapproval ☒ Approval with Condition
Waiver: ☐ Approval ☐ Disapproval ☒ Not Applicable

Project Description

AEP Ohio Transmission Company (Applicant, or AEP Ohio Transco) proposes to rebuild and upgrade approximately 2.6 miles of 138 kV transmission line between the existing Sawmill Substation and the existing Brookside Substation, which is located in Washington Township and the city of Dublin, Franklin County. A total of 47 steel pole structures would replace existing lattice towers. The new structures include five single circuit, steel monopole dead end structures, two double circuit, steel monopole structures, four double circuit, two-pole steel dead end structures, and 36 single circuit, steel monopole structures. The existing lattice towers, which have been in place over 60 years, are approximately 100 feet tall, and the new steel monopole structures would be approximately 85 feet tall.

The proposed project would be located entirely on existing right-of-way owned by Ohio Power Company, except for one span just south of Interstate 270 that would require an additional 10 feet of easement. All easements necessary for this project have been obtained.

The Applicant plans to commence construction of the project as early as the first quarter 2020 and place the facility in service by May 2021. The capital cost of the proposed transmission line rebuild project is estimated to be \$10,900,000 and that cost would be borne by the Applicant. The Applicant filed supplemental information regarding two minor centerline adjustments for this project on January 8, 2020.

Need

This is a baseline project driven by a planning criterion violation, which consisted of thermal overloads of up to 127 percent on the Brookside-Sawmill circuit under single and double contingencies. While this violation was initially thought to have been caused by a load ramp schedule provided by a new customer, further investigation revealed that the planning criterion violation occurred as a result of de-rating of the transmission line.¹ De-rating of the line was necessary to address reduced vertical clearances on the Brookside-Sawmill transmission line caused by structures and trees near the edge of the right-of-way (e.g., sheds, signs, light poles, etc.) and to address related concerns about conductor blowout. Additionally, the existing transmission line was found to have 35 age-related open conditions associated with conductors, transmission tower structures, and nearby trees.

Alternatives considered by the Applicant were all deemed infeasible and eliminated from further review.² The Applicant's analyses concluded that construction of the project on the existing right-of-way was the best and most reasonable option as the route is short, efficient, direct and minimizes viewshed impacts. It also provides for distribution under-build onto the new transmission structures, creating a cleaner, and more simplified right-of-way where all of the electric utilities would be located on one set of poles rather than in parallel alignments.

PJM Interconnection, LLC has identified this proposed transmission project as a baseline project, filed as number b3109.³ The project was also included in the 2019 Long Term Forecast Report to the Public Utilities of Ohio, filed in Case No. 19-1501-EL-FOR.⁴

Nature of Impacts

Land Use

The existing 138 kV transmission line, which the re-built line would follow, runs in a north-south direction west of Sawmill Road. The line crosses two institutional properties following along a bike trail at the Dublin Scioto High School and a place of worship. The line also crosses a recreation area located within the city of Dublin. Several residential areas abut or are crossed by the existing right-of-way. Some tree clearing in residential areas would be required to access, install, and maintain the line. No agricultural land nor agricultural districts are crossed by the project. A highway crossing (I-270) would be required for this rebuild project. The Applicant is

1. A sag study was performed on the Sawmill 138 kV line. The results of the study identified existing structures near the edge of the right-of-way that resulted in derating of the line.

2. Alternatives considered include: (1) Aboveground and underground construction along Sawmill Road and Riverside Drive in lieu of the existing right-of-way (in addition to the high cost, this would involve numerous potential conflicts with the OSU airport, traffic management, development, and existing underground electric, gas, water and sewer infrastructure), and (2) An underground option within the existing right-of-way (presence of a large diameter sewer main within the existing right-of-way made available space insufficient for an underground alternative along the existing right-of-way).

3. PJM Interconnection, "Transmission Construction Status," accessed December 31, 2019, <https://www.pjm.com/planning/rtep-upgrades-status/construct-status.aspx>. Please note that baseline project b3109 s also includes rebuilding the Bethel-Sawmill transmission line. The need and solution for this project were presented to the Western Subregional Regional Transmission Expansion Plan (SRRTEP) Committee during the November 2018 and February 2019 meetings.

4. AEP Ohio Transmission Company, Inc, "Long-Term Forecast Report to the Public Utilities Commission of Ohio," Public Utilities Commission of Ohio Case No. 19-1501-EL-FOR, April 15, 2019.

coordinating with the Ohio Department of Transportation to remove the existing overhead conductor and install the new line over this span of highway.

Since the existing line being replaced dates back over 60 years ago, development has occurred up to the 50-foot right-of-way. The Applicant would need to work with property owners along the route to move physical objects located within the existing right-of-way, including but not limited to trees, sheds and fences in order to remove the existing line and install the new line. The Applicant would also need to coordinate timing of access and construction with property owners along the route.

Cultural Resources

The Applicant's cultural resources consultant performed a literature review and Phase I cultural resource management investigation (archaeology and history/architecture) for the project. The consultant determined that the project would not involve nor impact any significant cultural resources or landmarks, and that no further cultural resource management work was considered to be necessary. The findings were submitted to the Ohio Historic Preservation Office (OHPO). The OHPO responded to the consultant in concurrence that this project would not affect historic properties.

Surface Waters

The right-of-way contains two streams including one perennial and one intermittent stream. No poles would be located in streams. No in-water work is planned, and no permanent impacts are anticipated.

The right-of-way corridor contains one category-one wetland. None of the replacement structures would be located within wetlands, and no wetland fill is proposed for the project.

Construction access would not require wetland and stream crossings. Erosion control measures including silt fencing would be used where appropriate to minimize runoff impacts to stream channels.

The Applicant stated that the Storm Water Pollution Prevention Plan (SWPPP) and Notice of Intent for the transmission line would be submitted in support of the National Pollutant Discharge Elimination System Permit in January 2020. Staff does not anticipate issues with the procurement of this permit.

Approximately 55 feet of the proposed route crosses a 100-year floodplain area. The Applicant stated that no temporary or permanent fill would be placed within the 100-year floodplain. A floodplain development permit would not be required.

Threatened and Endangered Species

Some tree clearing would be required for access associated with this project. The project area is within the range of state and federal endangered Indiana bat (*Myotis sodalis*) and the federal threatened northern long-eared bat (*Myotis septentrionalis*). As tree roosting species in the summer months, the habitat of these species would be impacted by the project. In order to avoid impacts to the Indiana bat and northern long-eared bat, Staff recommends that the Applicant adhere to seasonal tree cutting dates of October 1 through March 31 for all trees three inches or greater in diameter, unless coordination efforts with the Ohio Department of Natural Resources and the U.S.

Fish and Wildlife Service allows a different course of action. The proposed project would not impact any bat hibernacula.

Impacts to other state and federally listed species are not anticipated, due to no proposed in-water work and a lack of suitable habitats.

Conclusion

Staff's review of the application as supplemented included consideration of the requirements listed in R.C. 4906.10. Based on Staff's review, the application meets the necessary criteria for granting a certificate. Staff recommends automatic approval of this application on February 4, 2020, provided that the following condition is satisfied. Staff notes that its recommendation for approval of this application should not be construed as a recommendation for approval of cost recovery in any ratemaking proceeding.

Condition:

- (1) The Applicant shall adhere to seasonal cutting dates of October 1 through March 31 for removal of any trees greater than three inches in diameter, unless coordination with the Ohio Department of Natural Resources and the U.S. Fish and Wildlife Service allows a different course of action.

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 19-1974-EL-BLN

Summary: Staff Report of Investigation (dated January 28, 2020) electronically filed by Mr. Matt Butler on behalf of Staff of OPSB